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*Counsel to Defendants Toshiba Corporation,  
Toshiba America, Inc., Toshiba America  
Information Systems, Inc., and Toshiba  
America Electronic Components, Inc.*

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 (SAN FRANCISCO DIVISION)

15 IN RE: CATHODE RAY TUBE (CRT)  
16 ANTITRUST LITIGATION

Case No. 07-5944 SC  
MDL No. 1917

18 This Document Relates to  
19 Case No. 13-cv-1173-SC (N.D. Cal.)

20 SHARP ELECTRONICS CORPORATION;  
21 SHARP ELECTRONICS MANUFACTURING  
22 COMPANY OF AMERICA, INC.,

Plaintiffs,

v.

HITACHI, LTD., *et al.*,

Defendants.

**DECLARATION OF LUCIUS B. LAU  
IN SUPPORT OF THE TOSHIBA  
DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL PURSUANT TO  
CIVIL LOCAL RULES 7-11 AND  
79-5(d)**

29 DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE  
30 TOSHIBA DEFENDANTS' ADMINISTRATIVE MOTION TO FILE  
31 DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)

Case No. 07-5944 SC  
MDL No. 1917

I, Lucius B. Lau, hereby declare as follow:

1. I am Counsel with the law firm of White & Case LLP, attorneys for Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Information Systems, Inc., and Toshiba America Electronic Components, Inc. (collectively, the “Toshiba Defendants”). I make this declaration in support of the Toshiba Defendants’ Administrative Motion to File Documents Under Seal Pursuant to Civil Local Rules 7-11 and 79-5(d), dated January 13, 2014.

2. I have personal knowledge of the facts set forth in this declaration and if called upon to do so I could and would testify competently to such matters.

3. On June 18, 2008, the Court issued a Stipulated Protective Order (Dkt. No. 306) (the “Stipulated Protective Order”).

4. On December 20, 2013, Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc. served Responses and Objections to Defendants MT Picture Display Co., Ltd. and LG Electronics USA, Inc.’s First Set of Interrogatories (the “Sharp Interrogatory Responses”). These responses are designated as “Confidential” under the Stipulated Protective Order.

5. On January 13, 2014, the Toshiba Defendants filed a Motion for Leave to File Supplemental Reply in Support of Their Motion to Dismiss Sharp’s Complaint (the “Motion for Leave”); a Supplemental Reply attached as Exhibit A to the Motion for Leave; and the Sharp Interrogatory Responses attached as Exhibit 1 to the Supplemental Reply.

6. Portions of the Motion for Leave and the Supplemental Reply contain citations to, and discussions of, material in the Sharp Interrogatory Responses. As such, the Toshiba Defendants filed these documents, with the Sharp Interrogatory Responses, under seal.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 13<sup>th</sup> day of January, 2014, in Washington, D.C.

Lucius B. Lau

**DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE  
TOSHIBA DEFENDANTS' ADMINISTRATIVE MOTION TO FILE  
DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)**

Case No. 07-5944 SC,  
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## **CERTIFICATE OF SERVICE**

On January 13, 2014, I caused a copy of “DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE TOSHIBA DEFENDANTS’ ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)” to be electronically filed via the Court’s Electronic Case Filing System, which constitutes service in this action pursuant to the Court’s order of September 29, 2008.

✓ Lucius B. Lau

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DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE  
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